

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**STEFANO GRANATA;
JUDSON THOMAS,
COLBY CANNIZZARO;
CAMERON PROSPERI;
THE GUN RUNNER, LLC;
and FIREARMS POLICY
COALITION, INC.**

Plaintiffs

: Civil Rights Complaint
: 42 U.S.C. § 1983

CIVIL ACTION NO.
1:21-CV-10960-RWZ

V.

MAURA HEALEY, in her official capacity as Attorney General of the Commonwealth of Massachusetts; and **THOMAS TURCO**, in his official capacity as Secretary of Executive Office of Public Safety and Security of the Commonwealth of Massachusetts,

Defendants

**PLAINTIFFS' ASSENTED TO MOTION FOR EXTENSION OF TIME
TO FILE AN OPPOSITION**

Plaintiffs Stefano Granta, Judson Thomas, Colby Cannizzaro, Cameron Prosperi, The Gun Runner, LLC and Firearms Policy Coalition, hereby respectfully request that this Court extend the time within which Plaintiffs must file their Opposition to Defendants' Motion to Dismiss by 14 days, from the current due date of September 3, 2021, up to and including September 17, 2021.

In support of this motion, counsel for Plaintiffs submit that on August 17, 2021, they were informed of Defendants' intention to file a Motion to Dismiss. On August 20, 2021, pursuant to D. Mass. Local Rule 7.1(2), the parties conducted a conference in a good faith attempt to resolve or narrow the issues in dispute. The parties were unable to reach any resolutions. Defendants filed their Motion to Dismiss and supporting Memorandum ("Motion") the same day, August 20, 2021.

Since the Motion was filed, counsel for Plaintiffs have been preoccupied with multiple time-sensitive matters in preexisting cases, and they must balance the preparation of the Opposition to this Motion simultaneously with multiple additional time-sensitive obligations in other cases over the next two weeks. Thus, counsel require additional time to research, draft, and timely file an Opposition that assists this Court in resolving the Motion. Furthermore, counsel have spoken with Phoebe Fischer-Groban, counsel for the Defendants, who does not oppose this Motion.

THEREFORE, Plaintiffs respectfully request this Honorable Court allow their Motion in the interests of justice.

DATED: August 31, 2021

Respectfully submitted,
The Plaintiffs,

/s/ Richard C. Chambers, Jr., Esq.

Richard C. Chambers, Jr., Esq.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 31, 2021.

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.